

EXHIBIT “B”

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

VINCENT MERCADO,

Plaintiff,

vs.

RAMON CULVER,

First Defendant,

**K.L. BREEDEN & SONS, LLC d/b/a
KLB SONS,**

Second Defendant,

and

**NATIONWIDE AGRIBUSINESS
INSURANCE COMPANY,**

Third Defendant.

Case Number: 23EV003785

Plaintiff responds to Defendants' Requests for Admissions as follows:

1. Admit that you have been a citizen of New York continuously since April 8, 2023.

RESPONSE: Admitted.

2. Admit that the amount in controversy in this case exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

RESPONSE: Admitted.

3. If your response to request no. 3 is anything other than an unqualified admission, admit that you or your counsel will not ask a judge or jury to award damages in excess of \$75,000, exclusive of interest and costs.

RESPONSE: Plaintiff's response to request no. 2 is an unqualified admission. Plaintiff therefore denies this request.

4. If your response to request no. 3 is anything other than an unqualified admission, admit that you will not amend your complaint to seek damages in excess of \$75,000.00, exclusive of interest and costs, after the expiration of one year from the date this case was commenced.

RESPONSE: Plaintiff's response to request no. 2 is an unqualified admission. Plaintiff therefore denies this request.

5. If your response to request no. 3 is anything other than an unqualified admission, admit that in the event of a verdict or judgment in excess of \$75,000, exclusive of interest and costs, you will agree not to execute on any portion of the verdict or judgment that exceeds \$75,000.00, exclusive of interest and costs.

RESPONSE: Plaintiff's response to request no. 2 is an unqualified admission. Plaintiff therefore denies this request.

6. If your response to request no. 3 is anything other than an unqualified admission, admit that in the event of a verdict or judgment in excess of \$75,000, exclusive of interest and costs, you will agree that the verdict or judgment shall be satisfied and canceled upon payment of \$75,000.00, exclusive of interest and costs.

RESPONSE: Plaintiff's response to request no. 2 is an unqualified admission. Plaintiff therefore denies this request.

This the 16th day of August, 2023.

Respectfully submitted,
NIMMONS MALCHOW JOHNSON

/s/ Chris C. Johnson
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